

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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In re	:	Chapter 13
DANIELLE RIGGS	:	
DEBTOR	:	
DANIELLE RIGGS	:	
PLAINTIFF	:	LEAD CASE No. 18-17963 JKF
Vs.	:	
	:	Adversary Case No.: 19-00013
	:	JKF
PENNSYLVANIA HOUSING	:	
AND FINANCE AGENCY	:	
DEFENDANT	:	
	:	

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**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff requests, pursuant to Bankruptcy Rule 7034 and Federal R. Civ. P. 34, that Defendant produce each of the following documents to be delivered to Plaintiff's attorney for inspection and copying within the time limits set forth in the aforementioned rules.

**DEFINITIONS AND INSTRUCTIONS**

Unless negated by the context of the interrogatory, the following definitions are to be considered to be applicable to all interrogatories contained herein:

(A) "Documents" is an all-inclusive term referring to any writing and/or recorded or graphic matter, however produced or reproduced. The term "documents" includes, without limitation, correspondence, memoranda, interoffice communications, minutes, reports, notes, schedules, analyses, drawings, diagrams, tables, graphs, charts, maps, surveys, books of account, ledgers, invoices, purchase orders, pleadings, questionnaires, contracts, bills, checks, drafts, diaries, logs, proposals, print-outs, recordings, telegrams, films, tax returns, and financial statements, and all other such documents tangible or retrievable of any kind. "Documents" also include any preliminary notes and drafts of all the foregoing, in whatever form, for example, printed, typed, longhand, shorthand, on paper, paper tape, tabulating cards, ribbon blueprints, magnetic tape, microfilm, film, motion picture film, phonograph records, or other form.

(B) With respect to documents, the term "identify" means to give the date, title, author and addressee; "identify" with respect to documents further means:

(i) To describe a document sufficiently well to enable the interrogator to know what such document is and to retrieve it from a file or wherever it may be located;

(ii) To describe it in a manner suitable for use as a description in a subpoena;

(iii) To give the name, address, position or title of the person(s) who has custody of the document and/or copies thereof.

1. A full payoff figure for the first mortgage including outstanding fees and costs good through March 1, 2019. Said payoff should be for the full amount needed to satisfy the first mortgage in full.
2. All documents maintained by the Defendant related to the accounts relevant to this action including but not limited to this action including but not limited to:
  - a) Property inspections;
  - b) Any valuations done on the Debtor's property located at 1203 Crestview Road, Darby, PA 19023 since the conception of the loan;
  - c) Any buyer price opinions;
  - d) Transaction records;
  - e) Payment records;
  - f) Account ledgers;
  - g) Calculations of interest due;
  - h) Correspondence;
  - i) Notices sent to the Debtor;
  - j) Internal memoranda concerning the Debtor's account;
  - k) All records and telephone contacts in possession of the Defendant.
3. A pencil ledger concerning the pre-petition payments for the First Mortgage.
4. A pencil ledger concerning the pre-petition payments for the Second Mortgage.
5. An hourly breakdown of any and all legal fees assessed on the Debtor's first mortgage.
6. An hourly breakdown of any and all legal fees assessed on the Debtor's second mortgage.
7. A full breakdown of any fees and costs assessed on the Debtor's first mortgage.
8. A full breakdown of any fees and costs assessed on the Debtor's second mortgage.
9. All documents maintained by Defendant concerning collection activity related to the Plaintiff.
10. All documents mailed to the Plaintiff by the Defendant, at any time, including but not limited to:
  - a) Monthly statements
  - b) Account statements
  - c) Promotional material
  - d) Advertisements
  - e) Last three escrow analyses done on the first mortgage loan.

11. All documents which you intend to use or introduce in the trial of this proceeding.

DATED: March 1, 2019

Respectfully submitted,

/s/ Mitchell Lee Chambers, Esq.  
602 Little Gloucester Road, Ste. 5  
Blackwood, NJ 08012  
Phone: (856) 302-1778  
Fax: (856) 302-1779

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**CERTIFICATION OF SERVICE**

I, Mitchell Lee Chambers, counsel for Debtor, do hereby certify that, on the date hereof, I caused to be served, by fax or first class United States mail, postage prepaid, a true and correct copy of Plaintiff's Notice to Produce Documents upon counsel for Defendant at the following address:

**VIA EMAIL**

DANIELLE RIGGS, Debtor  
1203 CRESTVIEW ROAD  
DARBY, PA 19023

Via ECF

KML LAW GROUP  
C/O Kevin McDonald, Esq.  
701 Market Street  
Philadelphia, PA 19106

Dated: MARCH 1, 2019

/s/ Mitchell Lee Chambers, Esq.  
602 Little Gloucester Road, Suite 5  
Blackwood, NJ 08012  
Phone: 856-3021-778

